

Sandor Frankel (SF-8642)
Stuart E. Abrams (SA-6957)
FRANKEL & ABRAMS
230 Park Avenue
New York, New York 10169
(212) 661-5000
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
**KAREN MANNO, individually and
d/b/a "Lucky Girl Music,"**

Plaintiff,

-against-

**TENNESSEE PRODUCTION CENTER, INC., :
d/b/a "Chartbuster Karaoke",**

Defendant.
-----X

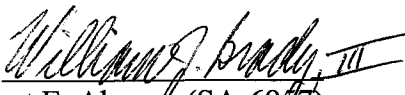
07 Civ. 10360 (BSJ)

NOTICE OF MOTION

PLEASE TAKE NOTICE that upon the accompanying Affidavit of William J. Brady, III, sworn to on March 13, 2008 and the exhibits thereto, upon the Memorandum of Law dated March 13, 2008 submitted herewith, and upon all papers and proceedings heretofore had herein, the undersigned will move this Court, at the United States District Courthouse for the Southern District of New York at 500 Pearl Street, New York, N.Y. 10007, before the Clerk of the Court, as soon as counsel may be heard, for an Entry of Default against defendant Tennessee Production Center, Inc., d/b/a "Chartbuster Karaoke."

Dated: New York, New York
March 13, 2008

FRANKEL & ABRAMS

By: 
Stuart E. Abrams (SA-6987)
William J. Brady, III (WB-5965)
230 Park Avenue
New York, NY 10169
(212) 661-5000
Attorneys for Plaintiff